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7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 PARNELL JAY FAIR,

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of  
the State of Nevada; L. TURLEY P# 15885  
14 individually; A. RYNDAK P# 16540,  
individually; UNIVERSITY MEDICAL  
15 CENTER, D/B/A UNIVERSITY MEDICAL  
CENTER OF SOUTHERN NEVADA, a  
16 Nevada Governmental Entity; CHASITY  
TRAVIS, individually; JENNA A. DOUD;  
17 individually; JESSE WELLS, individually;  
SHAIN HOWARD, individually; SCOTT  
18 KEVIN LEE, individually; BROCK T.  
WENTZ, individually; DOES I - X, and  
19 ROES I - X, inclusive ,

20 Defendants.

Case No. 2:20-cv-01841-JCM-BNW

11 [PROPOSED] STIPULATION AND  
12 ORDER TO STAY DISCOVERY

21  
22 Plaintiff, PARNELL JAY FAIR, by and through his counsel of record ANDRE M.  
23 LAGOMARSINO, ESQ. and DAVEN P. CAMERON, ESQ. of the law firm of  
24 LAGOMARSINO LAW; Defendants UNIVERSITY MEDICAL CENTER and CHASITY  
25 TRAVIS, through their counsel of record JEFFREY I. PITEGOFF, ESQ. of the law firm of  
26 PITEGOFF LAW OFFICE; Defendants LAS VEGAS METROPOLITAN POLICE  
27 DEPARTMENT, LUKAS TURLEY, and ALEXANDER RYNDAK, through their counsel of  
28 record LYSSA S. ANDERSON, ESQ., RYAN W. DANIELS, ESQ., and KRISTOPHER J.

1 KALKOWSKI, ESQ. of the law firm of KAEMPFER CROWELL; Defendant BROCK T.  
2 WENTZ, D.O., through his counsel of record KEITH A. WEAVER, ESQ. and MELANIE L.  
3 THOMAS, ESQ. of the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP;  
4 Defendants JENNA DOUD and JESSE WELLS, by and through their counsel of record  
5 ROBERT C. MCBRIDE, ESQ. and SEAN M. KELLY, ESQ., of the law firm of MCBRIDE  
6 HALL; Defendant SHAIN HOWARD, by and through his counsel of record ANTHONY D.  
7 LAURIA, ESQ., of the law firm of LAURIA TOKUNAGA GATES & LINN, LLP, CASEY  
8 ALLEN ROEHR, by and through his counsel of record KATHERINE J. GORDON, ESQ., of  
9 the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, SCOTT KEVIN LEE, by and  
10 through his counsel of record JOHN H. COTTON, ESQ. and BRAD J. SHIPLEY, ESQ., of  
11 the law firm of JOHN H. COTTON & ASSOCIATES, LTD, hereby stipulate as follows:

12 1) Discovery shall be stayed pending ruling on the Defendants' motions to  
13 dismiss, subject to potential lifting of the stay upon terms and conditions that the parties  
14 and the court deem just;

15 2) The discovery stay shall include all discovery already served, and not yet due,  
16 which to-date is as follows:

17 a) Plaintiff's First Set Of Requests For Production Of Documents To  
18 Jesse Wells;

19 b) Plaintiff's First Set Of Interrogatories To Defendant Jesse Wells;

20 c) Plaintiff's First Set Of Requests For Production Of Documents To  
21 Defendant Chasity Travis;

22 d) Plaintiff's First Set Of Interrogatories To Defendant Chasity Travis;

23 e) Plaintiff's First Set Of Requests For Production Of Documents To  
24 Defendant Casey Roehr;

25 f) Plaintiff's First Set Of Interrogatories To Defendant Casey Roehr;

26 g) Plaintiff's First Set Of Requests For Production Of Documents To  
27 Defendant Shain Howard;

28 h) Plaintiff's First Set Of Interrogatories To Defendant Shain Howard;

1 i) Plaintiff's First Set Of Requests For Production Of Documents To  
2 Defendant University Medical Center;

3 j) Plaintiff's First Set Of Interrogatories To Defendant University Medical  
4 Center;

5 k) Plaintiff's First Set Of Interrogatories To Defendant Jenna Doud;

6 l) Plaintiff's First Set Of Requests For Production Of Documents To  
7 Defendant Jenna Doud;

8 m) Plaintiff's First Set of Requests for Production of Documents to  
9 Defendant Las Vegas Metropolitan Police Department;

10 n) Defendant Las Vegas Metropolitan Police Department's First Set of  
11 Requests for Admissions to Plaintiff;

12 o) Defendant Las Vegas Metropolitan Police Department's First Set of  
13 Requests for Production of Documents to Plaintiff; and,

14 p) Defendant Las Vegas Metropolitan Police Department's First Set of  
15 Interrogatories to Plaintiff.

16 3) The parties request the Court to set a status check sometime in March 2021,  
17 to discuss the pendency of Defendants' motions to dismiss. If the motions to dismiss have  
18 not been decided at the time of the status check, the Plaintiff will move to reopen discovery  
19 at the status check hearing; however, the Defendants' reserve their right to file a motion to  
20 stay discovery pending decision on their motions to dismiss but hereby enter this stipulation  
21 to avoid motion practice at this time.

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1 IT IS SO STIPULATED AND AGREED

2 Dated: January 5, 2021

Dated: January 5, 2021

3 LAGOMARSINO LAW

KAEMPFER CROWELL

4  
5 /s/ Daven P. Cameron

/s/ Lyssa S. Anderson

6 ANDRE M. LAGOMARSINO, ESQ.  
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Turley, and Alexander Ryndak*

11 Dated: January 8, 2021

Dated: January 5, 2021

12 PITEGOFF LAW OFFICE

MCBRIDE HALL

14 /s/ Jeffrey Pitegoff

/s/ Sean Kelly

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Jesse Wells*

19 Dated: January 5, 2021

Dated: January 5, 2021

20 JOHN H. COTTON & ASSOCIATES,  
21 LTD.

LAURIA TOKUNAGA GATES & LINN,  
LLP

22 /s/ Brad J. Shipley

/s/ Anthony D. Lauria

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*Attorney for Defendant Shain Howard*

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1 Dated: January 5, 2021

Dated: January 5, 2021

2 LEWIS BRISBOIS BISGAARD & SMITH  
3 LLP

LEWIS BRISBOIS BISGAARD & SMITH  
LLP

4 /s/ Katherine J. Gordon  
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D.O.*

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10 ORDER

11 IT IS ORDERED that the parties' stipulation is GRANTED. Discovery is stayed pending the  
district judge's ruling on the Defendants' motions to dismiss.

12 IT IS FURTHER ORDERED that a status check is set for 3/23/2021 at 10:00 AM in LV courtroom  
13 3B by videoconference before Magistrate Judge Brenda Weksler. The hearing will take place via  
Zoom videoconference. To receive a Zoom invitation, counsel must contact courtroom  
14 administrator Jeff Miller at jeff\_miller@nvd.uscourts.gov no later than noon on the day prior to the  
hearing and no sooner than one week prior to the hearing.

15 **IT IS SO ORDERED**

16 **DATED:** 5:20 pm, January 12, 2021

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19 **BRENDA WEKSLER**  
20 **UNITED STATES MAGISTRATE JUDGE**  
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